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March 17, 2024

VIA CM/ECF

Honorable Zahid N. Quraishi, U.S.D.J
United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Kim, et al. v. Hanlon, et al.
Docket No. 3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi:

Kindly accept this letter as follow up to my correspondence yesterday regarding potential witness issues. *See* Docket Entry No. 142. We are pleased to report that the parties have reached an agreement regarding an amendment to the March 15, 2024 Order Setting Schedule for Preliminary Injunction Hearing [Docket Entry No. 141] (the “Hearing Order”).

Specifically, Defendants are adding Noah Dion as a potential witness for their case. Plaintiffs have agreed and will ensure Mr. Dion’s appearance. As noted previously, Plaintiffs have designated the candidate plaintiffs as 30(b)(6) witnesses. In addition, the parties have reaffirmed that all objections regarding witnesses or testimony are reserved and may be raised at the time of the hearing as contemplated in the Hearing Order.

Should this proposal be acceptable to the Court, then we kindly request that the Hearing Order be amended accordingly. We have included a “so ordered” line below for the Court’s convenience.



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Thank you for the Court's continued assistance with this matter.

Respectfully,

GENOVA BURNS LLC

s/ Rajiv D. Parikh
RAJIV D. PARIKH

RDP
c: All counsel of record

SO ORDERED:

 3/17/2024
Hon. Zahid N. Quraishi, U.S.D.J.

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